

Change Log for LSRP Supplemental Certification for
Initial Ground Water RAP Application for MNA

List of significant changes from Version 1.1 (6/17/24) to Version 1.2 (12/18/24)

Note: The instructions version number was changed from 1 to 1.2 to avoid confusion.

Certification Criteria Section:

- Changed “For the ground water data that is being used to demonstrate MNA, there are no individual contaminant concentrations that are 3 orders of magnitude or greater than the applicable Ground Water Remediation Standard (GWRS) and none of the contaminants exceed 1% of their effective water solubility;” to:

“For the ground water data that are being used to demonstrate MNA, there is no individual contaminant concentration that is three (3) orders of magnitude or greater than the applicable Ground Water Remediation Standard (GWRS) and there is no individual contaminant concentration that exceeds 1% of its water solubility for a contaminant that has a density greater than water;”

and added the following note in the instructions for this statement:

“Note: The three (3) orders of magnitude should be based on the Class II-A aquifer GWRS in effect at the time the evaluation is performed. The Supplemental Certification can be used for any aquifer classification.”

- Changed “There is no ground water contamination above the GWRS containing per- and polyfluoroalkyl substances (PFAS), including but not limited to perfluorononanoic acid (PFNA), perfluorooctanoic acid (PFOA), and perfluorooctane sulfonic acid (PFOS);” to:

“There is no ground water contamination above the GWRS containing per- and polyfluoroalkyl substances (PFAS), including but not limited to perfluorononanoic acid (PFNA), perfluorooctanoic acid (PFOA), and perfluorooctane sulfonic acid (PFOS), or PFAS sampling was not required;”

- Added the following note to “There is no competent bedrock ground water contamination above the GWRS;” in the instructions:

“Note: As noted in Sections 3.1.3.1.3 and 3.4 of the Ground Water Technical Guidance: Site Investigation, Remedial Investigation, and Remedial Action Performance Monitoring document, competent bedrock refers to bedrock where structural features are present (e.g., bedding plane fractures, joint sets, foliation and lineaments, etc.). A transitional weathered bedrock zone frequently overlies competent bedrock. This occurs because physical and chemical weathering of the competent bedrock will cause the development of additional porosity within the rock, to where the rock is no longer competent. This weathered bedrock behaves as unconsolidated sediments (similar to overburden) overlying competent bedrock.”

- Added the following note to “There is not a commingled plume condition for similar constituents,” in the instructions:

“Note: The Supplemental Certification can be used if the Initial Ground Water RAP Application submitted is addressing multiple releases at a site with the same co-permittees.”

- Added the following note to “The Remedial Action does not include a Point of Entry Treatment (POET) water system(s);” in the instructions:

“Note: The Supplemental Certification can be used if a POET system is present but was not installed as a requirement to address site-related ground water contamination and is not considered an engineering control required for the site.”

- Added the following note to “The Remedial Action does not include a vapor intrusion (VI) engineering control(s)/mitigation system(s); and” in the instructions:

“Note: The Supplemental Certification can be used if a VI mitigation system is present but was not installed as a requirement to address site-related ground water contamination and is not considered an engineering control required for the site.”

Section B:

- Changed “Ground water contamination has been horizontally and vertically delineated at the site pursuant to N.J.A.C. 7:26E-4.3(a)4, employing a variance(s) that is documented in the RAR per N.J.A.C. 7:26E-1.7.” to:

“Ground water contamination has been horizontally and vertically delineated pursuant to N.J.A.C. 7:26E-4.3(a)4, employing a variance(s) that is documented in the RAR per N.J.A.C. 7:26E-1.7.”

and added the following note in the instructions for this sub-section:

“Note: The Supplemental Certification can be used if the ground water contamination is migrating or has migrated off-site.”